

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION**

UNITED STATES OF AMERICA)
v.)
JAMES ALLEN BRIDGES) 3:24-CR-00070-FDW-SCR-1

UNOPPOSED MOTION TO CONTINUE SENTENCING

Mr. JAMES ALLEN BRIDGES, pursuant to Federal Rule of Criminal Procedure 32(b), respectfully moves this Court to reschedule the sentencing hearing on November 21, 2024, due to an attorney conflict.

I. Relevant Procedural History

On April 29, 2024, Mr. Bridges entered a plea agreement to one count of conspiracy to distribute methamphetamine in violation of U.S.C. §§ 841(a)(1), 841(b)(1)(A), and 846 (Count One). (Plea Agmnt., ECF No. 2; Mins., Acceptance, ECF No. 14.) On October 26, 2024, this Court set sentencing for November 21, 2024. (Order, Dkt. Entry Oct. 26, 2024.)

II. Factual Assertions

As an aside, based on email communications with the Government and this Court, undersigned counsel anticipated that Mr. Bridges' sentencing hearing would occur after November 21, 2024, and very likely would occur in mid-December, 2024. Undersigned counsel respectfully submits that on November 21,

2024, she has multiple conflicts which prevent her appearance in the Western District of North Carolina. It was due to this good-faith understanding that Ms. Spearman did not previously notify the Court of her conflicts on November 21, 2024.

Mr. Bridges respectfully requests the present continuance due to an attorney conflict. Mr. Bridges' first-undersigned attorney of record is scheduled to appear at a sentencing hearing on November 20, 2024, at 2:00 pm Pacific Time in the Eastern District of Washington in Spokane which was scheduled on July 2, 2024. *See United States v. Anishchenko et al.* 2:22-cr-00057-2 (E.D. Wash. May 3, 2022) (ECF No. 153). It is undersigned counsel's personal experience that travel to Atlanta, Georgia (her place of residence) from Spokane, Washington, is problematic as flights are infrequent and there are often extreme delays. A trip to Spokane will require red-eye travel back from Washington to Atlanta's Hartsfield-Jackson International Airport, and then a layover and a second flight to Charlotte, North Carolina. Out of an abundance of caution, Mr. Bridges requests a brief rescheduling of his sentencing hearing to allow for inevitable delays in travel and so that his attorney of his choosing can be fully present.

Additionally, Ms. Spearman is conflicted as she is scheduled to appear in the Northern District of Georgia for a sentencing hearing on November 21, 2024. *See United States v. Robert William Watkins* (N.D. Ga., March 7, 2024).

Furthermore, undersigned counsel is available on the following days for a rescheduled hearing: November 4-6, November 12, November 15, November 18, November 19, December 2-5, and December 9-12, December 17-19, 2024, and can provide additional days upon the Court's request.

Mr. Bridges has been consulted regarding this continuance and has no opposition to rescheduling to a date either earlier or later than November 21, 2024, or even to pushing the hearing in to 2025.

III. Memorandum of Law and Argument

A “court must impose sentence without unnecessary delay.” Fed. R. Crim. P. 32(b)(1). However, a “court may, for good cause, change any time limit prescribed in [Federal Rule of Criminal Procedure 32].” Fed. R. Crim. P. 32(b)(2).

IV. Opposing Party’s Position

The Government does not oppose to this request.

V. Conclusion

Mr. Bridges, based on the foregoing factual assertions and argument, prays that this Court reschedule the sentencing hearing on November 21, 2024, to a date amenable to all parties.

Date: November 4, 2024

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on November 4, 2024, I electronically filed the foregoing UNOPPOSED MOTION TO CONTINUE SENTENCING with the Clerk of the United States District Court for the Western District of North Carolina by way of the CM/ECF system, which automatically will generate a notice of electronic filing and serve this document on the attorneys of record for the parties in this case by electronic mail.

Date: November 4, 2024

Respectfully Submitted,

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